H. Power

James H. Power
Marie E. Larsen
HOLLAND & KNIGHT LLP
31 West 52nd Street
New York, New York 10019
Telephone: 212-513-3200
Telefax: 212-385-9010

Email: james.power@hklaw.com marie.larsen@hklaw.com

Attorneys for Plaintiff Baere Maritime LLC

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BAERE MARITIME LLC, individually and on behalf of M/V YASA GOLDEN HORN (IMO No. 9334040)

15 Civ ____()

Plaintiff,

- agaınst -

O W BUNKER PANAMA S.A., O.W. BUNKER USA INC, O.W BUNKER NORTH AMERICA INC, O.W. BUNKER HOLDING NORTH AMERICA INC, ING BANK N.V.

Defendants.	

EX PARTE APPLICATION TO DEPOSIT FUNDS INTO REGISTRY OF COURT

Baere Maritime LLC ("Baere Maritime or "Plaintiff"), individually and on behalf of the vessel M/V Yasa Golden Horn (the "Vessel"), files this application pursuant to 28 U.S.C. § 1335 and under Rule E of the Supplemental Rules for Admiralty or Maritime Claims for permission to deposit into the registry of this Court the sum of \$761,503.42, representing the amount owed for the sale and delivery of bunker fuel to the Vessel, plus 6% annual interest on the amount to secure any *in rem* claims against the Vessel and any *in personam* claims against Plaintiff.

WHEREFORE, Plaintiff prays that its check be received into the registry of this Court as payment of disputed property for the ultimate disposition by order of this Court in the above-styled interpleader action. A proposed order is submitted with this application.

Dated: New York, New York

April **8**, 2015

HOLLAND & KNIGHT LLP

James H. Power

Marie E. Larsen 31 West 52nd Street

New York, New York 10019 Telephone: 212-513-3200 Telefax: 212-385-9010

Email: james.power@hklaw.com marie.larsen@hklaw.com

Attorneys for Plaintiff Baere Maritime LLC, individually and on behalf of M/V Yasa Golden Horn (IMO No.9334040)